

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

STATUTORY REVIEW OF THE SYSTEM )  
FOR REGULATING RATES AND CLASSES ) Docket No. RM2017-3  
FOR MARKET DOMINANT PRODUCTS )

**DECLARATION OF SANDRA MIAO  
ON BEHALF OF NATIONAL WILDLIFE FEDERATION**

I, Sandra Miao, declare as follows:

1. I am the Sr. Director of Membership for the National Wildlife Federation (“NWF”). NWF is a charitable organization exempt from federal income tax under Internal Revenue Code Section 501(c)(3), and is headquartered in Reston, Virginia. My business address is 11100 Wildlife Center Drive, Reston, VA 20190.

2. I have served NWF as its Sr. Director of Membership for the past eight years. As Sr. Director of Membership, I coordinate NWF’s direct mail fundraising programs and monitor postage costs to maximize the organization’s net income and increase donor response, which in turn provides more funding for programs for wildlife and their habitats.

3. I also serve as a member of the board of directors of the Alliance of Nonprofit Mailers (“ANM”). I have over 30 years of experience working in the nonprofit direct mail industry and advocating for the maintenance of affordable postage costs and high service standards.

4. NWF's mission is to unite all Americans to ensure that wildlife thrive in a rapidly changing world. Since 1936, the NWF has joined with people across the country to share knowledge and resources in a common effort to protect wildlife, special places, and natural resources. Protecting these resources is a cause that has long united Americans from all walks of life and political stripes. All Americans, regardless of location, depend on clear air, clean water, and a healthy environment. NWF takes pride in defending those needs.

5. NWF's past and current efforts have involved saving wetlands, creating wilderness areas, and protecting wildlife habitats, encouraging children to be active outdoors, and finding solutions to the climate crisis.

6. NWF's wildlife preservation efforts include dealing with warming climate, protecting endangered species, containing the spread of invasive species, creating safe corridors for wildlife, keeping common species common with state wildlife action plans, restoring bison to the Great Plains and advancing red wolf recovery.

7. NWF works to protect, maintain and restore healthy habitats around waters, coasts and floodplains, gulf restoration, public lands, tribal lands, forest and farms. NWF advocates for federal and state policies that will improve wildlife conservation on hundreds of millions of acres of public, tribal and private lands, including thousands of miles of streams, rivers, lakes and coastlines. NWF also encourages Congress to appropriate adequate funds for natural resources and encourages federal agencies to include climate science in their wildlife conservation management plans. By supporting

wildlife conservation, including habitat protecting, NWF seeks to save thousands of species, protect biodiversity, and avoid expensive emergency recovery measures.

8. Connecting people with nature is an increasingly important mission for NWF. NWF connects Americans adults and children to the outdoors through Garden for Wildlife™, Eco-Schools USA environmental education initiative, Earth Tomorrow®, and many other programs.

9. NWF is also committed to fighting climate change, the greatest current threat to American wildlife, wild places and communities. Failure to arrest global warming could cause breeding ground for ducks in the American heartland to dry up, moose in New England to be lost to parasites, western forests to burn more often, and Appalachian streams to become inhospitable to trout. NWF is working to reduce greenhouse emissions throughout the country by promoting a rapid transition to clean energy. NWF also works with farmers and ranchers to adopt agricultural practices that protect wildlife, reduce emissions, and store carbon.

10. Mail plays a vital role in NWF's mission. We rely on direct mail to raise money and awareness. NWF mails 48,000,000 pieces of direct mail annually, mostly at nonprofit Standard Mail rates, totaling \$6,259,000 annually. We circulate our publications, *Ranger Rick*®, *Ranger Rick Jr.*, *Cub*, *National Wildlife Catalog* and *National Wildlife Magazine* at Periodicals Mail rates. We also typically generate several pieces of First-Class Mail in response to each donation received.

11. Allowing the USPS to increase its market-dominant rates faster than inflation would increase NWF's fundraising costs and reduce the funds available for our programs. NWF would immediately be forced to reduce the quantity of mail for its fundraising appeals and renewals, magazines, and other important publications and switch to alternative channels of communication. This would greatly impair NWF's effectiveness: a large portion of our donors and target audience still prefer receiving print publications, which can depict nature and wildlife more vividly than, for example, telemarketing can. Increases in postage thus could impair the cleanliness, safety, and beauty of the outdoors and its wildlife for future generations.

12. The mere prospect of the proposed hikes is already impacting NWF. We are in the midst of budget planning for FY21, which begins in September 2020. We must have our implementation plans clearly mapped out months in advance, so that we can be cost efficient when buying our paper and scheduling our press and machine times at printers and mail facilities. As we are unable to correctly project our postal expenses, we must reduce mail volume and convert to different channels of communication, in order to produce an accurate budget.

13. The backward-looking formula-based proposals make it impossible for NWF to predict how large each year's postal price increases will be. This makes business planning in future years very difficult. We will be forced to decide that it is more beneficial for NWF to move our member communications to other mediums where we can better predict and control our spending.

14. NWF had already warned the PRC that its previous proposal would have a crippling effect on our organization and, more importantly, the mission we support. The PRC's new proposals make it obvious that the PRC completely ignored our previous comments. As a major USPS customer, that is disheartening and frustrating. It is also frustrating to know that the PRC is required to consider things like the relative value to the people of the kinds of mail entered into the postal system, and the educational, scientific, cultural, and informational value of the mail to the recipient. But the PRC's proposal ignores these factors: in fact, it punishes nonprofit mailers like us most harshly of all, when our customers rely on our mail products to inform, enlighten, inspire, and educate.

15. Every year, our executive team has to control our organization's costs and decide how to spend money in a way that has the most impact for our mission and the populations we serve. The PRC's proposals will make mail a less valuable medium for our organization. It would harm not only those who support NWF, but those who work and make it their life goal to better the world around us for wildlife. In the end, government spending to protect wildlife, public lands, and the environment would need to increase to offset the diminished effectiveness of NWF and other conservation organizations. This would have drastic effects for our environment, wildlife and America.

16. Further affiant sayeth not.

## VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 23, 2020.

A handwritten signature in cursive script that reads "Sandra Miao".

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Sandra Miao

National Wildlife Federation